

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**

**In Re:**

**John Malone,**  
**Debtor**

**Chapter 13**  
**Case No. 24-10885**

**RESPONSE TO BOSTON WATER AND SEWER COMMISSION'S LIMITED**  
**OBJECTION TO DEBTOR'S MOTION TO SELL**

Now comes the Debtor and responds to Boston Water and Sewer Commission's Limited Objection to Debtor's Motion to Sell as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Neither admitted nor denied as to the amount of post-petition arrears, as Debtor is uncertain as to the amount. Debtor acknowledges that all pre and post-petition charges owed to Boston Water and Sewer Commission need to be paid from the sale of the real estate and has provided for that in his proposed Order.
9. Admitted.
10. Denied, as the Debtor's proposed Order provides for all outstanding water and sewer charges to be paid to Boston Water and Sewer Commission at the closing.

**Wherefore**, the Debtor requests the Court find as follows:

1. Boston Water and Sewer Commission's Objection be denied.
2. For such other relief as the Court deems just.

Debtor,  
by his attorney,

Dated: November 18, 2025

/s/ John Ullian

John Ullian, Esq. BBO# 542786

Amy Puliafico, Esq. BBO# 682332

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**CERTIFICATE OF SERVICE**

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **RESPONSE TO BOSTON WATER AND SEWER COMMISSION'S LIMITED OBJECTION TO DEBTOR'S MOTION TO SELL** by ECF or by mailing a copy of same, postage prepaid, to the following interested parties:

Richard King  
Office of the US Trustee  
J.W. McCormack Post Office & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

John Malone  
28 Savin Hill Avenue  
Dorchester, MA 02125

Carolyn Bankowski  
Chapter 13 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114

Boston Water and Sewer Commission  
Janet M. Mahoney  
Assistance General Counsel  
980 Harrison Avenue  
Boston, MA 02119

Dated: November 18, 2025

/s/ John Ullian

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